



OKLAHOMA Office of Management & Enterprise Services

State of Oklahoma Office of Management and Enterprise Services Policies and Procedures

Unpaid Internship Program

Effective Date of Policy: 04/01/2019	Next Scheduled Review: 09/20/2020
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Date Policy Last Revised: 02/25/2019	
Approved: Dana Webb, as Designee of OMES Director John Budd	Approval Date: 02/25/2019

Reference: [Fact Sheet #71: Internship Programs Under The Fair Labor Standards Act.](#)

Policy

It is the policy of the Office of Management and Enterprise Services to provide unpaid internships for students/interns to learn about OMES and to gain valuable insight and experience in an area of study as it is conducted in the State of Oklahoma. In addition, the internship program is intended to provide a meaningful, positive learning work experience such that participants will potentially seek full-time employment with OMES in the future.

All OMES employees and participants in the program shall comply with this policy.

Definitions

Internship – A period of work experience offered by an organization for a limited period of time.

Intern – An unpaid student or trainee who works at a trade or occupation in order to gain work experience. An intern may be a currently enrolled vo-tech school student who has completed high school, a college or university student, or post-graduate student who earns academic credit from time spent in the internship.

Unpaid – Not subject to any wages, compensation and/or benefits of any kind for the time spent in this internship.

Supervisor – An OMES employee who currently holds supervisory status.

Implementation

Internship Requirements

Participants in the OMES unpaid internship program must ensure the intern is the primary beneficiary of the internship; that is, the education and experience received by the intern from an internship is for the express benefit of the intern, regardless of any incidental benefit that may inure to OMES. Interns shall not be considered an OMES and/or State of Oklahoma employee under any circumstances, and shall not be entitled to any wages, compensation and/or benefits of any kind for the time spent in this internship and must be informed as such.

Training provided in the internship must be similar to that which would be given in an educational environment and shall be solely related to an educational purpose. The internship shall be tied to the intern's formal education program by integrated coursework or the receipt of academic credit. The internship's duration is limited to the period in which the internship provides the intern with beneficial learning. The internship shall be of a fixed duration, established prior to the outset of the internship. The schedule shall accommodate the intern's academic commitments by corresponding to the academic calendar.

Interns shall not replace or displace any employee of OMES. Interns shall not be used as substitutes for regular workers or to augment the existing workforce during specific time periods. The internship shall not be used as a trial period for individuals seeking employment at the conclusion of the internship period.

Participants in the OMES unpaid internship program may complete documentation related to the internship as required by the Intern's educational institution. The intern shall be responsible for ensuring that the internship meets his or her educational institution's requirements.

OMES and the intern shall execute the Educational Internship Agreement prior to the start date of the internship. OMES shall not be liable for injury sustained or health conditions that may arise for the intern during the course of this internship. OMES may at any time, in its sole discretion, terminate this internship without notice or cause.

Human Capital Management's Responsibilities

Administration

HCM will be responsible for administration of the unpaid internship program. In the administrative role, HCM will act to ensure that the OMES internship agreement is signed by both the intern and OMES supervisor before the internship begins. HCM is responsible for coordinating with universities both to ensure the OMES internship will fulfill university requirements for academic credit and to perform close-out duties with respect to university requirements at the end of the internship period. HCM will provide the intern with access to OMES policies. HCM will track interns through the application, selection, internship and exit process for record-keeping purposes.

Recruitment

HCM shall be responsible for recruiting students to participate in the unpaid internship program. HCM will contact local education entities and/or attend targeted career fairs to recruit students who are interested in an unpaid internship with OMES to fulfill course credit requirements. HCM will create and maintain a list of university contacts and internship coordinators from different academic departments at area schools to facilitate these efforts. HCM will partner with OMES Public Affairs to create advertisements for both universities and internal divisions of OMES to attract participants to the program. HCM will also be responsible for posting open internship positions to the applicant tracking system.

Evaluation

HCM will be responsible for evaluating and tracking the unpaid internship program for quality assurance and compliance. HCM will conduct reviews of internships in progress to ensure compliance with [DOL guidelines](#). HCM will administer exit surveys/evaluations to interns and supervisors, as well as track metrics to determine the success of the program. HCM will periodically review the internship evaluations for compliance and to establish changes that can be made to the program to ensure continuous improvement and evolution of the program.

Supervisors' Responsibilities

Request Interns

Supervisors will be responsible for requesting interns, which will be subject to approval. Supervisors will identify individual/departmental needs for interns and the amount of time available to dedicate to supervising them. Prior to requesting the intern, supervisors will identify work assignments and target projects that will be assigned to the intern. Supervisors will request approval to participate in the unpaid internship program by submitting the Intern Request Form via email to HCM prior to [date to be established] for spring semester, prior to [date to be established] for summer semester, and prior to [date to be established] for fall semester, indicating how many slots are available, who will supervise the interns, the area of education and the job description. Before the internship can begin, the supervisor must develop learning objectives and goals in accordance with the requirements of the educational entities.

Selection

Supervisors will be responsible for conducting internship interviews with qualified applicants. The supervisor will inform HCM of the selected intern before the internship begins.

Set Expectations and Monitor Progress

Supervisors are responsible for communicating to the intern the goals of the internship and for monitoring the intern's progress. The supervisor must initiate the onboarding process. The supervisor is responsible for closely supervising the intern, including tracking hours worked by the intern and ensuring the intern's activities are tied to the intern's formal education program. The supervisor must complete any reports or timesheets required by educational entities related to the internship program. The supervisor should avoid assigning routine work that is structured

around OMES operations and is for the primary benefit of OMES (e.g., clerical work such as filing or typing). Duties assigned to the intern must provide a work experience that is complementary to the intern's course credit requirements. At the conclusion of the internship, supervisors must complete the internship evaluation form.

Interns' Responsibilities

Adherence to Rules

Interns shall obey the policies, rules and regulations of OMES and comply with OMES practices and procedures. Interns shall demonstrate honesty, punctuality, courtesy and a cooperative attitude. Within academic commitments, interns shall maintain a regular internship schedule determined by the intern and his/her supervisor. Transportation to and from the internship site is the responsibility of the intern. Interns assume all of the risks of participating in the internship program by signing the internship agreement prior to start of the program.

Satisfactory Progress

Interns must remain in good academic standing with their educational entities. Interns must complete the internship evaluation form at the conclusion of the internship.

Violation of this policy may be grounds for disciplinary action up to and including discharge, and immediate termination of the internship.